

From: Tomlinson, Jamie
Sent: Fri, 18 Feb 2022 12:36:07 -0500
To: Beaudoin, Denis; Whelan, Alison; Arcand, Michel
Cc: Clement, Wendy; Harb, Zeina; McDonald, Terry-Lynn
Subject: RE: Draft lines for EA - finance

Many thanks

From: Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>
Sent: February 18, 2022 12:35 PM
To: Tomlinson, Jamie <Jamie.Tomlinson@rcmp-grc.gc.ca>; Whelan, Alison <Alison.Whelan@rcmp-grc.gc.ca>; Arcand, Michel <michel.arcand@rcmp-grc.gc.ca>
Cc: Clement, Wendy <Wendy.Clement@rcmp-grc.gc.ca>; Harb, Zeina <Zeina.Harb@rcmp-grc.gc.ca>; McDonald, Terry-Lynn <Terry-Lynn.McDonald@rcmp-grc.gc.ca>
Subject: RE: Draft lines for EA - finance

Here is what we suggest also approved by A/Commr. Arcand.

We remain in daily communications with the financial institutions to assist them, when possible, to determine when assets can be unfrozen.

From: Tomlinson, Jamie <Jamie.Tomlinson@rcmp-grc.gc.ca>
Sent: February 18, 2022 12:31 PM
To: Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>; Whelan, Alison <Alison.Whelan@rcmp-grc.gc.ca>; Arcand, Michel <michel.arcand@rcmp-grc.gc.ca>
Cc: Clement, Wendy <Wendy.Clement@rcmp-grc.gc.ca>; Harb, Zeina <Zeina.Harb@rcmp-grc.gc.ca>; McDonald, Terry-Lynn <Terry-Lynn.McDonald@rcmp-grc.gc.ca>
Subject: RE: Draft lines for EA - finance

Could the line be this:

- Processes are in place to ensure once these entities are no longer involved in illegal activity, it will be a determination of banks to unfreeze accounts and communicate with their clients.
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From: Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>
Sent: February 18, 2022 12:27 PM
To: Whelan, Alison <Alison.Whelan@rcmp-grc.gc.ca>; Tomlinson, Jamie <Jamie.Tomlinson@rcmp-grc.gc.ca>; Arcand, Michel <michel.arcand@rcmp-grc.gc.ca>
Cc: Clement, Wendy <Wendy.Clement@rcmp-grc.gc.ca>; Harb, Zeina <Zeina.Harb@rcmp-grc.gc.ca>
Subject: RE: Draft lines for EA - finance

Subject to A/Commr. Arcand but the onus is on the bank to make that determination, not on the RCMP, although we could share information to that effect.

Banks will have more information at their disposal, including communicating with their clients.

From: Whelan, Alison <Alison.Whelehan@rcmp-grc.gc.ca>
Sent: February 18, 2022 12:23 PM
To: Tomlinson, Jamie <Jamie.Tomlinson@rcmp-grc.gc.ca>; Arcand, Michel <michel.arcand@rcmp-grc.gc.ca>; Beaudoin, Denis <denis.beaudoin@rcmp-grc.gc.ca>
Cc: Clement, Wendy <Wendy.Clement@rcmp-grc.gc.ca>; Harb, Zeina <Zeina.Harb@rcmp-grc.gc.ca>
Subject: RE: Draft lines for EA - finance

Thanks for this. Can we add this final bullet per the Commissioner's request? Edit as you see fit.

Jamie, once completed can you please send to Ken at PCO? Need them over in the next 10 mins if possible.

Thanks to all.

Emergency Measures Act and Finance

- The *Emergencies Act* allows law enforcement and monitoring agencies to work more closely with Canadian financial institutions; enhancing the effectiveness of law enforcement conducting investigations into blockades.
- It allows financial institutions to freeze financial products of individuals and companies suspected of involvement in the illegal acts mentioned in the law, and for law enforcement to share information with financial institutions for that purpose.
- Through the Act's powers, the RCMP is broadening the scope of Canada's anti-money laundering / anti-terrorist financing rules to now include crowdfunding platforms and the payment service providers, including digital assets. All crowdfunding platforms and the payment service providers they use now must register with FINTRAC, and report large and suspicious transactions to FINTRAC.
- With regards to the enacting and application of the Economic Emergency Measure Order, the RCMP is diligently working with municipal and provincial

partners, such as the Ottawa Police Service and the Ontario Provincial Police, to collect relevant information on persons, vehicle and companies. To that effect, the RCMP and its partners have developed an internal process to corroborate and validate collected information prior to sharing it with financial institutions.

- The RCMP is in constant communication with the financial institutions to help them make the proper determination, as per the powers of the EEMO, before they take action to freeze financial products within holding. Thus far the RCMP has shared several information packages of persons, vehicles and companies involved directly or indirectly in an activity prohibited under the Order.
- Presently, the RCMP is aware that several accounts and other financial products have been subject to a freeze.
- It remains the responsibility of the banks to make the decision of freezing the accounts, not an order from the law enforcement.
- While we are using the measures in place, we will not be sharing the numbers of accounts frozen as operational actions are being taken, and we want to be very careful not to jeopardize any of those ongoing actions.
- - Processes are in place to ensure once these entities are no longer involved in illegal activity, accounts will be unfrozen accordingly.